

Exhibit 04

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Case No. No. 1:22-cv-00983-VEC

-----x

NIKE, INC.,

Plaintiff,

-against-

STOCKX LLC,

Defendant.

-----x

August 24, 2023

10:07 a.m.

Video-recorded Deposition of
RICHARD LaMAGNA, an Expert Witness, taken
by Plaintiff, located at DLA Piper, 1251
Avenue of the Americas, New York, New
York, taken before Dawn Matera, a
Certified Shorthand Reporter and Notary
Public for the State of New York.

Page 2	Page 4
<p>1 2 A P P E A R A N C E S: 3 4 DLA PIPER Attorneys for Plaintiff 1251 Avenue of the Americas New York, New York 10020 (212)335-4500 6 By: MICHAEL HYNES, ESQ. 7 michael.hynes@dlapiper.com GABRIELLE VELKES, ESQ. 8 gabrielle.velkes@dlapiper.com 9 10 DEBEVOISE & PLIMPTON LLP Attorneys for Defendant 11 66 Hudson Boulevard New York, New York 10001 12 (212)909-6000 13 By: MEGAN K. BANNIGAN, ESQ. mbannigan@debevoise.com 14 ANITA KAPYUR, Law Clerk akapyur@debevoise.com 15 16 17 ALSO PRESENT: 18 LAURA LEWIS, ESQ., In-house Counsel StockX 19 KIM VAN VOORIS, ESQ., In-House Counsel 20 MATTHEW CHIN-QUEE, Legal Videographer 21 ~oOo~ 22 23 10:05:50 24 10:05:50 25</p>	<p>1 2 Megan Bannigan from Debevoise & 10:07:57 3 Plimpton on behalf of StockX. And 10:07:59 4 with me is my colleague from Debevoise 10:08:02 5 Anita Kapyur and in-house counsel, 10:08:05 6 general counsel of StockX Laura Lewis. 10:08:09 7 THE VIDEOGRAPHER: Thank you. 10:08:14 8 Will the court reporter swear in the 10:08:15 9 witness, please. 10:08:16 10 R I C H A R D L a M A G N A, the 11 Witness herein, having first been duly 12 sworn by the Notary Public, was examined 13 and testified as follows: 14 EXAMINATION BY MR. HYNES: 10:08:27 15 Q. Good morning, Mr. LaMagna. 10:08:27 16 A. Good morning Mr. Hynes. 10:08:29 17 Q. Do you understand that you're 10:08:30 18 here to have your deposition taken? 10:08:31 19 A. I do. 10:08:35 20 Q. And do you know in what case 10:08:36 21 your deposition is being taken? 10:08:37 22 A. Yes, I do. 10:08:39 23 Q. Which one? 10:08:39 24 A. Nike versus StockX. 10:08:40 25 Q. Do you know what that case is? 10:08:42</p>
Page 3	Page 5
<p>1 2 THE VIDEOGRAPHER: Good morning. 10:06:51 3 We are going on the record at 10:07 10:06:51 4 a.m. on August 24th, 2023. This is 10:06:54 5 media unit one of the videotaped 10:07:00 6 deposition of Rich LaMagna in the 10:07:02 7 matter Nike, Inc. v. StockX LLC in the 10:07:07 8 District Court, Southern District of 10:07:13 9 New York, case number 22-CV-0983. The 10:07:14 10 deposition is being held at 1251 10:07:22 11 Avenue of the Americas, New York, New 10:07:25 12 York. 10:07:27 13 My name is Matthew Chin-Quee 10:07:28 14 representing Veritext and I am the 10:07:30 15 videographer. The court reporter is 10:07:33 16 Dawn Matera from the firm Veritext. 10:07:34 17 Will all counsel please 10:07:38 18 introduce yourself. 10:07:41 19 MR. HYNES: Michael Hynes from 10:07:44 20 DLA Piper for the plaintiff. 10:07:45 21 MS. VELKES: Gabrielle Velkes 10:07:47 22 from DLA Piper for the plaintiff. 10:07:50 23 MS. VAN VOORHIS: Kim 10:07:52 24 Van Voorhis from Nike, Inc. 10:07:53 25 MS. BANNIGAN: Good morning, 10:07:55</p>	<p>1 2 A. Yes. 10:08:44 3 Q. Can you tell me? 10:08:44 4 A. It concerns allegations of 10:08:45 5 counterfeit, false advertising and unfair 10:08:48 6 business practices. 10:08:53 7 Q. Do you know what StockX is? 10:08:54 8 A. Yes, I do. 10:08:55 9 Q. Can you tell me what you think 10:08:57 10 it is? 10:08:58 11 A. It's an online secondary market 10:08:58 12 platform. 10:09:01 13 Q. I think I know what you mean by 10:09:02 14 online, but could you tell me what you 10:09:05 15 mean by secondary market platform? 10:09:07 16 A. Secondary market is a market 10:09:09 17 similar to Amazon or eBay where people 10:09:12 18 buy and sell products as opposed to a 10:09:17 19 direct vendor, as opposed to a vendor 10:09:24 20 such as Target or Walmart or something 10:09:27 21 like that. 10:09:30 22 Q. Okay. Would you agree that 10:09:31 23 counterfeit Nike products were sold on 10:09:37 24 the StockX platform? 10:09:39 25 A. No, I would not agree with 10:09:40</p>

Page 114	Page 116
<p>1</p> <p>2 A. Well, I think it depends on 13:49:53</p> <p>3 where you want to apply it and how you 13:49:57</p> <p>4 interpret some of these things. 13:50:03</p> <p>5 Q. Okay. Did you rely on it and 13:50:04</p> <p>6 cite it in your own report? 13:50:06</p> <p>7 A. I did, in reference to 13:50:08</p> <p>8 Professor Kammel's assertions that -- 13:50:10</p> <p>9 actually, she cites this document as 13:50:16</p> <p>10 essentially rationale or the basis for 13:50:20</p> <p>11 her opinions. 13:50:23</p> <p>12 Q. Okay. So do you believe that 13:50:24</p> <p>13 this is a reputable source for the 13:50:27</p> <p>14 guidelines for the selection and 13:50:30</p> <p>15 performance evaluation of authentication 13:50:32</p> <p>16 solutions for material goods in this 13:50:35</p> <p>17 case? 13:50:37</p> <p>18 A. Generally speaking, the ISO is 13:50:37</p> <p>19 a reputable source for guidelines in 13:50:41</p> <p>20 various sectors or industries. 13:50:47</p> <p>21 Q. Did you, in your work for 13:50:52</p> <p>22 StockX, apply ISO 22383 to StockX's 13:50:53</p> <p>23 programs? 13:50:57</p> <p>24 A. I didn't find that necessary to 13:51:00</p> <p>25 do. This is -- it's only a set of 13:51:02</p>	<p>1</p> <p>2 A. I consulted my more than 20 13:52:33</p> <p>3 years of experience. 13:52:38</p> <p>4 Q. Okay. 13:52:38</p> <p>5 A. In various, various reputable 13:52:40</p> <p>6 companies. 13:52:43</p> <p>7 Q. So you consider yourself to be 13:52:43</p> <p>8 an authoritative source? 13:52:47</p> <p>9 A. I do. 13:52:48</p> <p>10 Q. Did you consider -- consult any 13:52:48</p> <p>11 other authoritative sources other than 13:52:51</p> <p>12 yourself in evaluating StockX's 13:52:53</p> <p>13 authentication process? 13:52:56</p> <p>14 A. I consulted the materials 13:52:57</p> <p>15 produced by StockX and I consulted what 13:53:04</p> <p>16 their employees, their leadership, I 13:53:10</p> <p>17 should say, had to say about their 13:53:12</p> <p>18 process. 13:53:15</p> <p>19 Q. But those aren't authoritative 13:53:16</p> <p>20 sources, are they? 13:53:19</p> <p>21 A. Well, they are authoritative in 13:53:20</p> <p>22 that they know exactly what they do to 13:53:24</p> <p>23 for their authentication or verification 13:53:28</p> <p>24 process. 13:53:30</p> <p>25 Q. So StockX is an authoritative 13:53:31</p>
Page 115	Page 117
<p>1</p> <p>2 guidelines. It's not an authoritative 13:51:05</p> <p>3 source. 13:51:08</p> <p>4 Q. Okay. 13:51:08</p> <p>5 A. You know, looking at the 13:51:10</p> <p>6 effectiveness of authentication 13:51:13</p> <p>7 solutions, I've looked at what Professor 13:51:15</p> <p>8 Kammel's cited and I found that she 13:51:20</p> <p>9 actually misinterpreted some of these, 13:51:22</p> <p>10 some of these prescriptions or 13:51:28</p> <p>11 guidelines. 13:51:30</p> <p>12 Q. Okay. Did you -- sorry. Did 13:51:30</p> <p>13 you consult any authoritative sources in 13:51:47</p> <p>14 connection with your valuation of 13:51:51</p> <p>15 StockX's authentication process? 13:51:54</p> <p>16 A. Let me say one thing about this 13:52:03</p> <p>17 ISO. This ISO is written primarily, not 13:52:05</p> <p>18 exclusively, but primarily for brand 13:52:09</p> <p>19 holders. So a lot of these things in 13:52:11</p> <p>20 here would not necessarily apply to an 13:52:18</p> <p>21 entity that is not a brand holder. 13:52:23</p> <p>22 Q. Okay. Did you consult any 13:52:25</p> <p>23 authoritative sources in connection with 13:52:27</p> <p>24 your evaluation of StockX's 13:52:30</p> <p>25 authentication process? 13:52:32</p>	<p>1</p> <p>2 source; is that your testimony? 13:53:38</p> <p>3 A. Well, if you want to know about 13:53:39</p> <p>4 what StockX does for their authentication 13:53:43</p> <p>5 or verification program, I think they are 13:53:49</p> <p>6 the ones who know best what they do and 13:53:50</p> <p>7 what they don't do. And so I found it to 13:53:53</p> <p>8 be, from that perspective, an 13:53:57</p> <p>9 authoritative source. 13:54:02</p> <p>10 Q. Okay. Any other authoritative 13:54:03</p> <p>11 sources other than yourself and StockX 13:54:05</p> <p>12 that you considered in your evaluation of 13:54:07</p> <p>13 the StockX authentication process? 13:54:08</p> <p>14 A. Well, in my report I do make 13:54:10</p> <p>15 reference to various sources of 13:54:14</p> <p>16 information for different aspects of the 13:54:16</p> <p>17 report. If you want to go through those, 13:54:18</p> <p>18 through my footnotes, we can do that. 13:54:24</p> <p>19 But I do cite different 13:54:27</p> <p>20 articles. Different, for example, 13:54:33</p> <p>21 Gartner, Gartner is a well-respected 13:54:36</p> <p>22 consulting firm, what they talk about in 13:54:39</p> <p>23 terms of authentication. There is an 13:54:44</p> <p>24 example of another source that would be 13:54:47</p> <p>25 authoritative. 13:54:48</p>

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1

2 Q. When you wrote this report, why 18:52:27

3 didn't you just write, put paragraph 90 18:52:29

4 right under paragraph 89? 18:52:33

5 A. Because it's an appendix -- 18:52:37

6 it's submitted as an appendix, as a 18:52:38

7 separate. Appendicis are usually at the 18:52:40

8 end. 18:52:47

9 Q. Why did you make paragraph 90 18:52:47

10 an appendix instead of putting it in the 18:52:48

11 body of the reports as 90 comes right 18:52:51

12 after 89? 18:52:54

13 A. Because these are all, these 18:52:55

14 are research items. 18:52:56

15 MR. HYNES: Okay. No further 18:53:02

16 questions. Do you have anything? 18:53:03

17 MS. BANNIGAN: No further 18:53:04

18 questions. 18:53:05

19 MR. HYNES: Okay. Then we are 18:53:06

20 off the record. 18:53:08

21 THE VIDEOGRAPHER: This marks 18:53:08

22 the end of the deposition. We are 18:53:09

23 going off the record at 6:53 p.m. 18:53:11

24 (Time noted: 6:53 p.m.)

25

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1

2 ACKNOWLEDGMENT OF DEPONENT

3

4 I have read the foregoing

5 transcript of my deposition and except

6 for any corrections or changes noted on

7 the errata sheet, I hereby subscribe to

8 the transcript as an accurate record of

9 the statements made by me.

10

RICHARD LaMAGNA

11

12 SUBSCRIBED AND SWORN before

13 and to me this ____ day of _____,

14 2023.

15

NOTARY PUBLIC

16

17 My Commission Expires:

18

19

20

21

22

23

24

25

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1

2 CERTIFICATION

3

4 I, DAWN MATERA, a Notary Public

5 for and within the State of New York, do

6 hereby certify:

7 That the witness whose testimony

8 as herein set forth, was duly sworn by

9 me; and that the within transcript is a

10 true record of the testimony given by

11 said witness.

12 I further certify that I am not

13 related to any of the parties to this

14 action by blood or marriage, and that I

15 am in no way interested in the outcome of

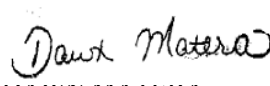
16 this matter.

17 IN WITNESS WHEREOF, I have

18 hereunto set my hand this 29th day of

19 August, 2023.

20

21 

22 DAWN MATERA

23

24

25

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1

2 I N D E X

3 Witness Page

4 RICHARD LaMAGNA 4

5 Examination By:

6 Mr. Hynes 4

7 Ms. Bannigan 267

8 Mr. Hynes 275

9

10

11 E X H I B I T S

12 LaMagna Page

13 Exhibit 1 Expert report of Richard 28

LaMagna

14

15 Exhibit 2 Speech Transcript - 80

Richard C. LaMagna Oral

Testimony Regarding

Anti-Counterfeiting

Amendments of 2003

17

18 Exhibit 3 Speech Transcript: 80

Richard C. LaMagna

Testimony Before the House

Subcommittee on Courts,

the Internet and

Intellectual Property, the

Global Threat of Software

Counterfeiting

22 Exhibit 4 ISO Standard 22383 105

23 Exhibit 5 November 17th, 2020 118

article by Taylor Lee

24

25

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
4:25	Do you know what that case is?	Do you know what that case is about ?	Transcription Error
7:11-12	My impression from the information that I read and learned	My impression from the information that I've read and learned	Transcription Error
9:13	Is that –	Is that – I swear I'm	Transcription Error
11:21-22	to make money off of that	to make money off of those	Transcription Error
17:13-14	You would say roughly, roughly three months ago.	I would say roughly, roughly three months ago.	Transcription Error
21:10	Roughly, yeah.	Roughly, I think , yeah.	Transcription Error
22:24	When did that call take place	How long – when did that call take place	Transcription Error
26:07-08	I don't know if I was ever normally instructed	I don't know if I was ever formally instructed	Transcription Error
28:18-19	We are going to mark this as LaMagna 1.	We are going to mark this as Exhibit LaMagna 1.	Transcription Error
30:04-05	And you issued an invoice that tells you how many hours	And you issued an invoice that says you how many hours	Transcription Error

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
33:19-20	So we'll get into the specifics a little bit.	So we'll get into the specifics in a little bit.	Transcription Error
40:21-22	I might of advised them on other anti-fraud measures.	I might have advised them on other anti-fraud measures.	Clarification
42:13-14	Is it your recommendation that the platform provides	Is it your recommendation that the platform provide	Clarification
43:05-08	if the platform had made a referral to law enforcement, how enforcement	if the platform had made a referral to law enforcement, law enforcement	Transcription Error
49:18-19	their online counterfeiting program	their online anti- counterfeiting program	Transcription Error
55:13-15	It's when a brand holder or an IP holder wants find out	It's when a brand holder or an IP holder wants to find out	Transcription Error
61:15-16	Well, for one I had a background, a long background	Well, for one I had a background, a strong background	Transcription Error
61:24-62:02	ISACA, which is Information Systems, Audit, Control Association.	ISACA, which is the Information Systems Audit and Control Association.	Clarification

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** Nike, Inc. v. StockX LLC, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
63:19-20	I would not have been as an auditing function.	I would not have had an auditing function.	Transcription Error / Clarification
69:12-13	I did not see --	I did not see evidence where -	Transcription Error
77:05-06	I know they hire so-called sneaker-heads .	I know they hire so-called sneakerheads .	Typographical Error
79:10-11	The information they provided to me	It was the information they provided, for me ,	Transcription Error
84:18-19	Is there anyway that a user of Office 97	Is there any way that a user of Office 97	Typographical Error
87:25-88:02	the top of your consulting firm, right?	the top is your consulting firm, right?	Transcription Error
107:09	Ms. Laura Ritza .	Ms. Laura Rizza .	Typographical Error
110:12	I got there 9:30.	I got there at 9:30.	Transcription Error
111:03	Ms. Sabba .	Ms. Saba .	Typographical Error
112:24-113:02	I believe my assessment of their program was valid and effective assessment.	I believe my assessment of their program was a valid and effective assessment.	Transcription Error

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
115:12-14	Did you consult any authoritative sources in connection with your valuation	Did you consult any authoritative sources in connection with your evaluation	Transcription Error / Clarification
117:23-24	There is an example	They're an example	Transcription Error
119:25	In fact it somewhat echos	In fact it somewhat echoes	Typographical Error
120:03-04	So it's your testimony that this Gartner article echos	So it's your testimony that this Gartner article echoes	Typographical Error
123:21-22	they measured that against what's in the database	they measure that against what's in the database	Clarification
130:22-23	Is there any other authoritative sources	Are there any other authoritative sources	Clarification
139:02-03	did you examine a StockX program	did you examine StockX's program	Transcription Error
141:03-04	before you put the report together on January 2nd, 2023	before you put the report together on June 2nd, 2023	Clarification
143:12-13	then find it hard to imagine	then I find it hard to imagine	Transcription Error / Clarification

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
161:24	their credit?	their credit cards ?	Transcription Error
164:5-6	it's a very large online seller of a third-party platform	it's a very large online seller, a third-party platform	Transcription Error
164:9	they have had difficult doing that.	they've had difficulty with doing that.	Transcription Error
167:15	undo emphasis	undue emphasis	Typographical Error
170:11-13	Do you think StockX could ever have honestly claimed that 100 percent of their products that are sold	Do you think StockX could ever have honestly claimed that 100 percent of the products that it sold	Transcription Error
172:15	sellers selling counterfeit	sellers selling counterfeits	Transcription Error
183:14	their motto is either it comes	their model is either it comes	Transcription Error
184:9-11	I don't know that they returned the counterfeits or the inauthentic.	I don't know that they return the counterfeits or the inauthentic items .	Transcription Error/ Clarification
184:18-19	proliferation of counterfeit goods ."	proliferation of counterfeits ."	Transcription Error

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
184:23-24	proliferation of counterfeit goods ?	proliferation of counterfeits ?	Transcription Error
185:5-6	fails to provide a consumers' marketplace.	fails to provide consumers a marketplace.	Transcription Error
185:11	it's going to encourage counterfeit	it's going to encourage counterfeits	Clarification
188:19	advocating responsibility	abdicating responsibility	Transcription Error
194:19	divulging anything,	divulging anything secret ,	Transcription Error
194:25	what they did was very standard and typical	what they did is very standard and typical	Transcription Error
195:2-3	the anticounterfeiting field. And is not a trade secret.	the anticounterfeiting field and is not a trade secret.	Transcription Error
195:23-24	And number 33 is "National Prescription Opioid"	And number 33 is " In Re: National Prescription Opioid"	Transcription Error
196:7	I don't know the exact term	I don't know the correct term	Transcription Error
196:12-13	I was retained -- and I am still doing it.	I was retained – it varied by case ; I am still doing it.	Transcription Error

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
196:15-16	four companies, it's depending on the case	four companies, depending on the case	Transcription Error
197:24-25	He could have protected his brand and himself	He could have protected his brand himself	Transcription Error
199:13	I would have to go back	I would also have to go back	Transcription Error
201:13-15	part of the research of Analysis Group was to go online	part of the research that Analysis Group did was to go online	Transcription Error/ Clarification
204:5	Alp Vision	AlpVision	Typographical Error
204:7	Alp Vision	AlpVision	Typographical Error
204:9	Alp Vision	AlpVision	Typographical Error
204:19	Alp Vision	AlpVision	Typographical Error
205:11	Alp Vision	AlpVision	Typographical Error
205:18	Alp Vision	AlpVision	Typographical Error
205:21	Alp Vision	AlpVision	Typographical Error

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
207:11-12	let's ask Laura to go to the room.	let's ask Laura to leave the room.	Transcription Error
209:17-18	Alp Vision	AlpVision	Typographical Error
209:20-21	Alp Vision	AlpVision	Typographical Error
210:7	include hyped limited drops	includes hyped limited drops	Transcription Error
211:6-7	What do you mean by artificial demand?	What do you mean by artificial demand? Is it fake demand?	Transcription Error
213:2-3	again, but I talked about	again, what I talked about	Transcription Error
217:5	StockX's counterfeiting program	StockX's anticounterfeiting program	Transcription Error
219:6-9	those were the only policies at that time, when in fact some of them I think existed before that.	those were the policies only at that time, when in fact some of them I think existed before that.	Clarification
221:10-12	Yeah, I think some of these I had looked at the article. I think that probably I saw it before June 2nd.	Yeah, I think some of these I had looked at the article -- I think that probably I saw it before June 2nd.	Transcription Error

Deposition Date: 8/24/2023

Deponent: Richard LaMagna – Errata Sheet

Case Name: *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
224:4-5	I am not, you know, quite sure for the purpose of the question.	I am not, you know, quite sure the purpose of the question.	Transcription Error
225:25- 226:1	I mean largely across the board in general.	I mean broadly , across the board, in general.	Transcription Error
227:8-9	same way as StockX or when the other platforms does.	same way as StockX or one of the other platforms does.	Transcription Error
229:2-3	That's right. Operating procedures.	That's right. Their operating procedures.	Transcription Error
243:17-19	If they didn't. If they were cavalier about it, they wouldn't fire people.	If they didn't, if they were cavalier about it, they wouldn't fire people.	Transcription Error
252:14-15	I recall correctly from the deposition	If I recall correctly from the deposition	Transcription Error
256:13	Sneakerstrup	Sneakerstrut	Transcription Error
257:4	10,000 plus	\$10,000+	Transcription Error
268:3	one of the Professor Kammel's reports	one of Professor Kammel's reports	Clarification

Deposition Date: 8/24/2023**Deponent:** Richard LaMagna – Errata Sheet**Case Name:** *Nike, Inc. v. StockX LLC*, No. 22 CV 983 (VC) (SN)

Page(s): Line(s)	Now Reads	Should Read	Reason
268:9	I heard that StockX refunded his money	I learned that StockX refunded his money	Transcription Error
286:2	elicit goods	illicit goods	Typographical Error
290:7	Appendicis	Appendices	Typographical Error

I, Richard LaMagna, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on August 24, 2023; that I have made such corrections as appear noted herein; and that my testimony as contained herein, as corrected, is true and correct.

DATED this 26 day of September, 2023.

Richard C. LaMagna

Richard LaMagna